

FILED
2022 JUL 15 01:43 PM
KING COUNTY
SUPERIOR COURT CLERK
E-FILED

CASE # 22-2-10378-7 SEA
IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

JENNY LU)	No. 22-2-10378-7 SEA
)	
PETITIONER,)	
)	RESPONDENT'S EXHIBITS 17-23
v.)	
)	
ANGELO PRADO,)	
)	
RESPONDENT)	

Respondent's Exhibits 17-23 are attached.

/sBrent Hart
Brent Hart, Attorney for Prado
WSBA 30368

Exhibit 17

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Exhibit 17 – April 21st, 2022 (Pro Club Meeting)



Exhibit 18

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Exhibit 18 – March 24th, 2022 (Jenny makes an unfortunate joke about “attempting suicide”)

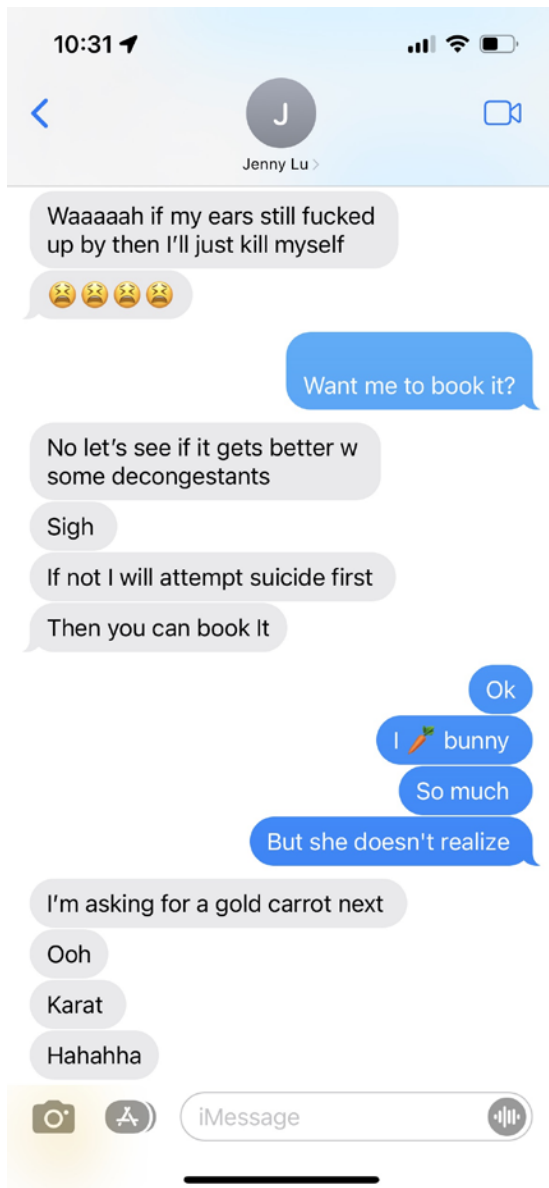
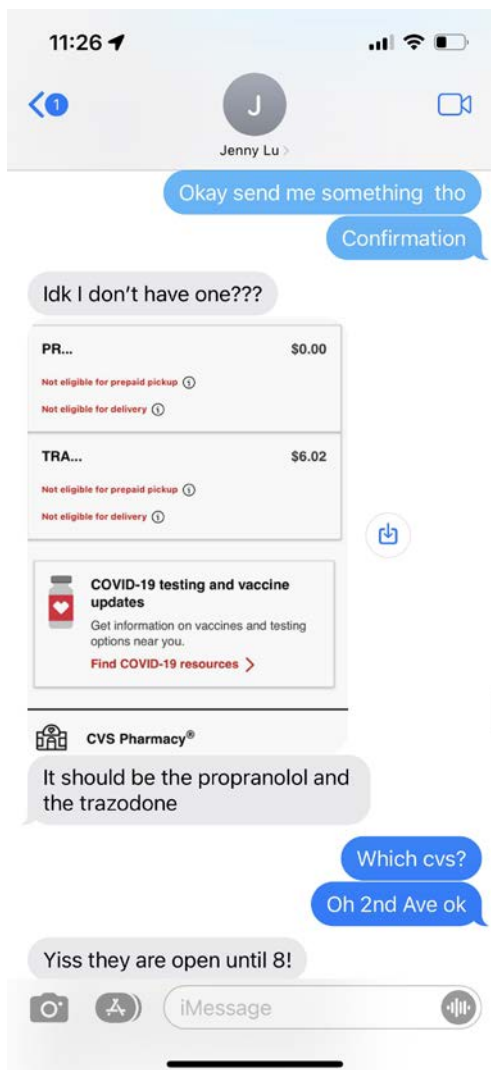


Exhibit 19

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Exhibit 19 – June 2022 and March 2022 [Jenny asks Angelo to pick up propranolol and trazodone]



5:37



Jenny Lu



3/7/2022

I think there are clear lessons learned from this and I think if I'm able to get some time to just work out a game plan for not having things get dropped while things are still not 100% healthy then it will be much better

I actually have extras, I'll start carrying them with me in my travel bag

I always bring them when traveling, I just don't think of New York as travel

I want to support you. I just don't know what can be done

I take my meds at night and in the morning, so it's really important that both those routines are really standardized

They're really simple and high impact things

Agreed. Is it something like adderall?

No lol they literally keep me awake and in touch with reality



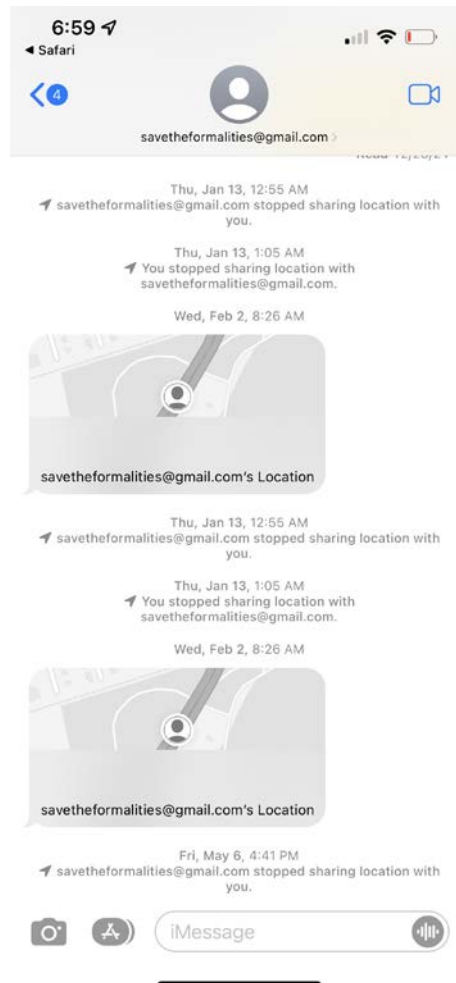
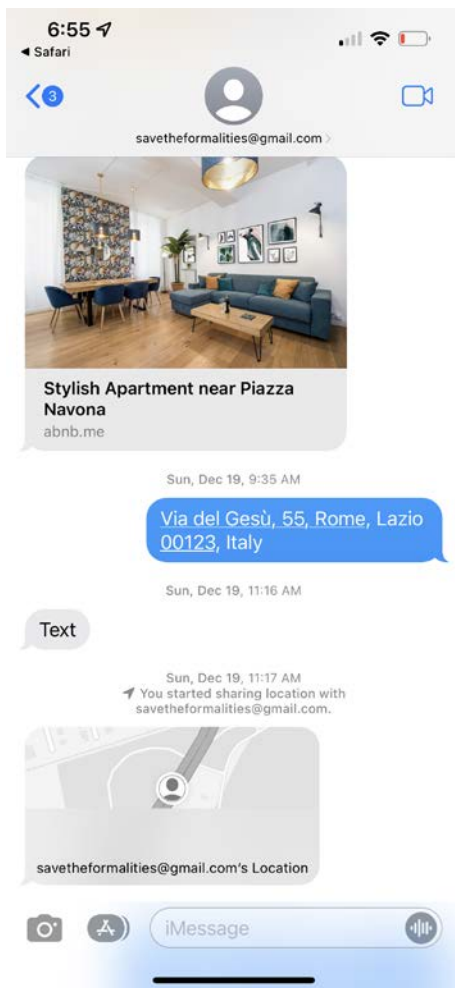
iMessage



Exhibit 20

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Exhibit 20 – December 2021, January 2022, February 2022 (Mutual location Sharing with Jenny's iCloud address)



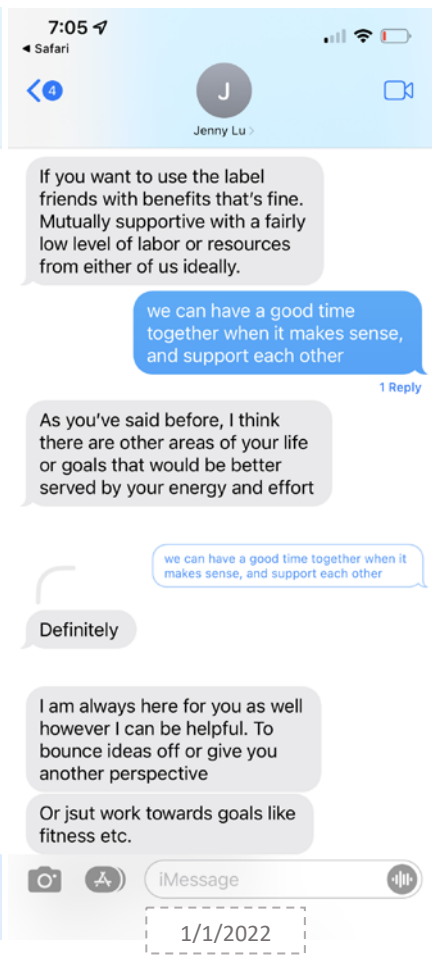
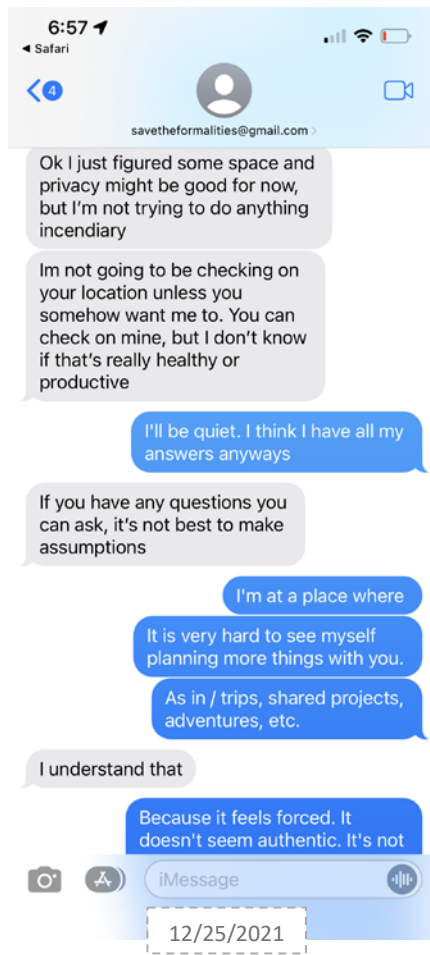
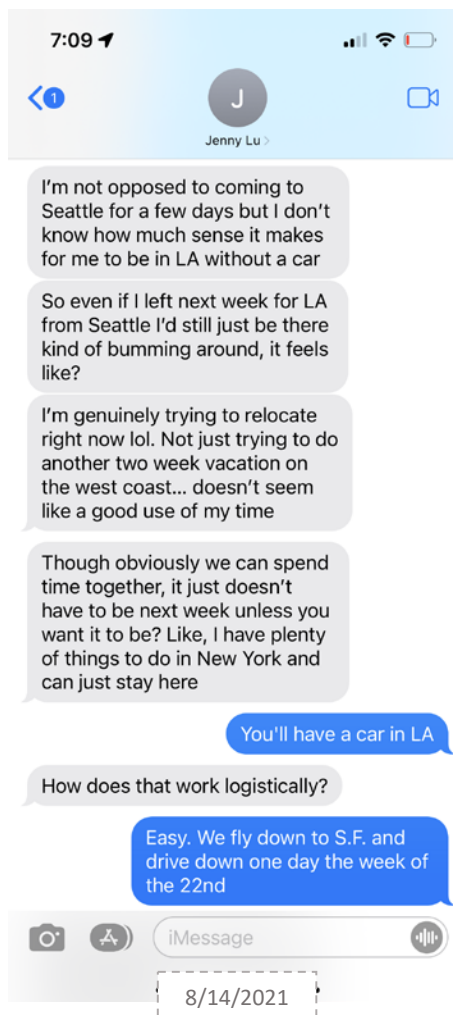
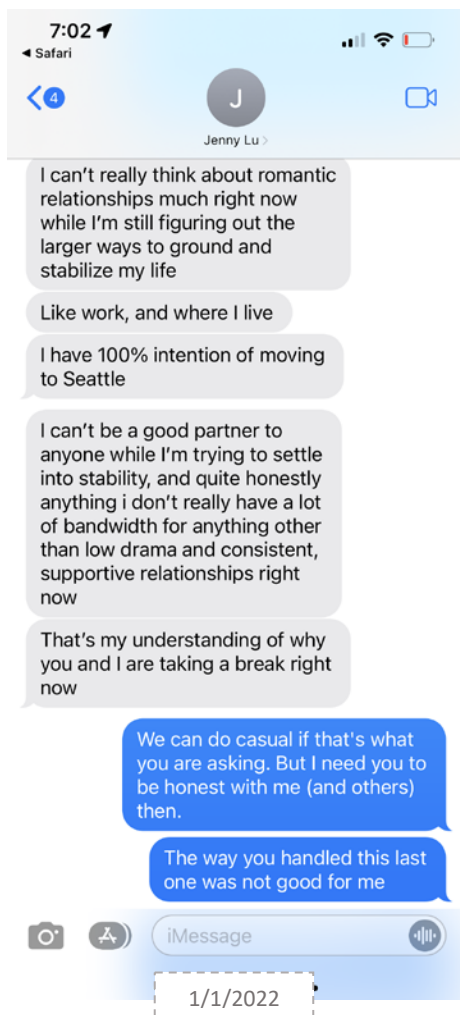
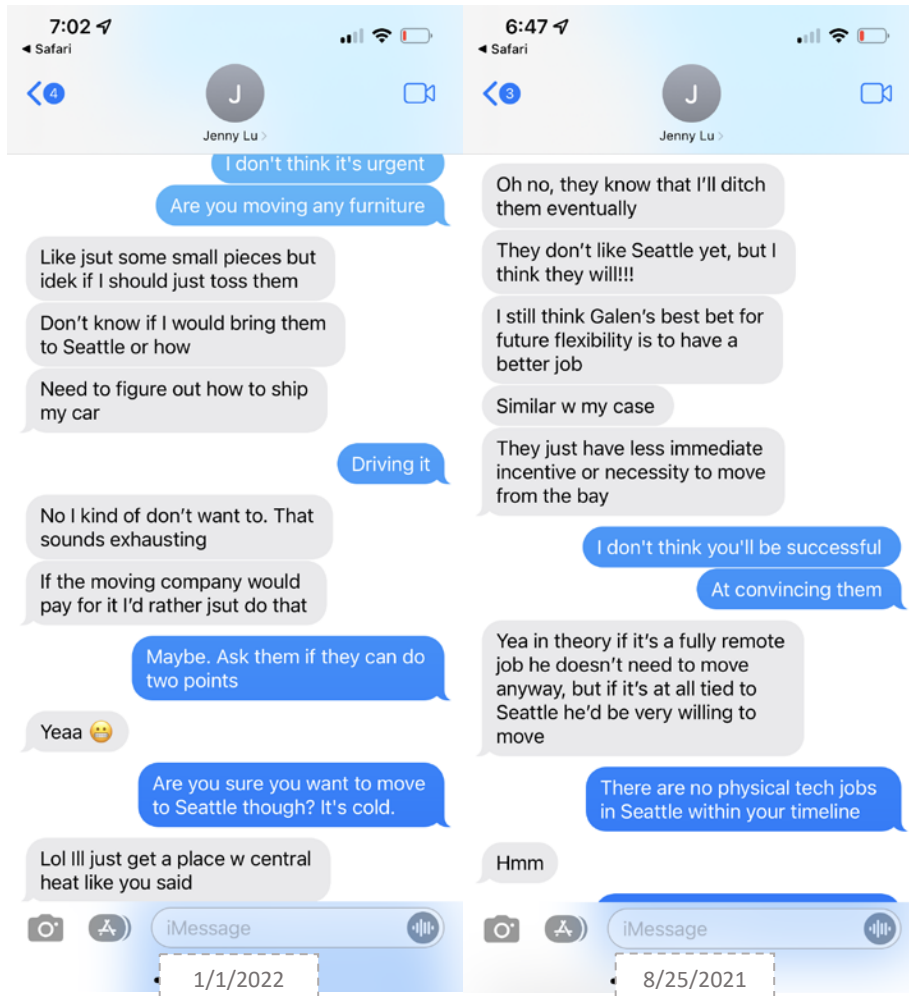
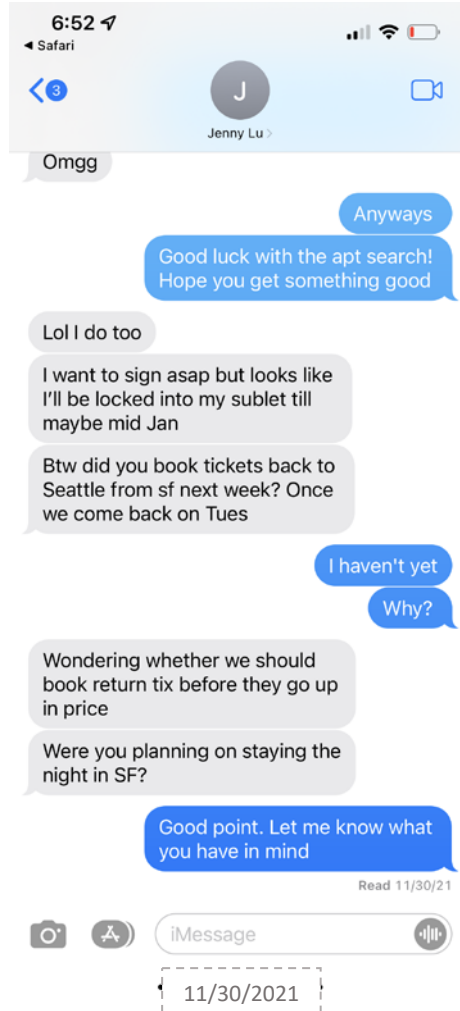


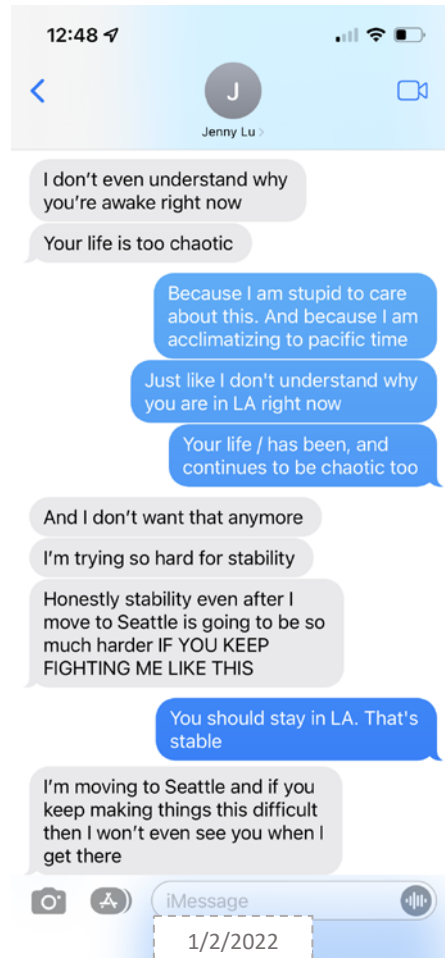
Exhibit 21

Exhibit 21 – 2021-2022 (Moving to Seattle from LA)









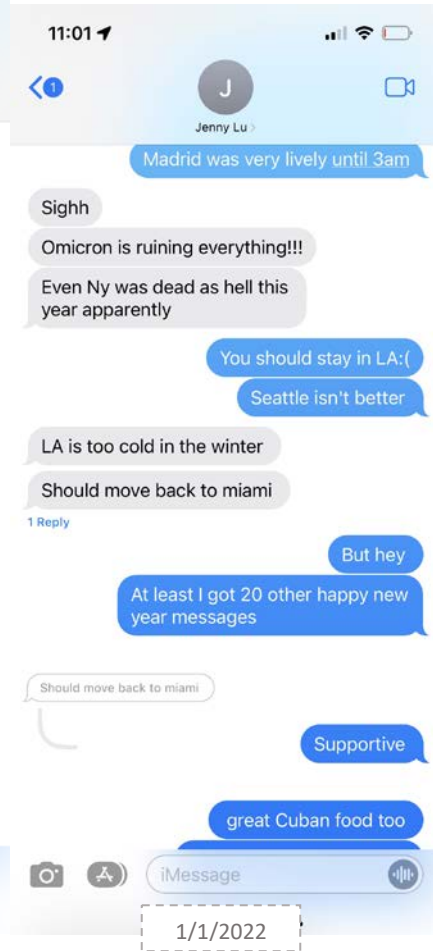
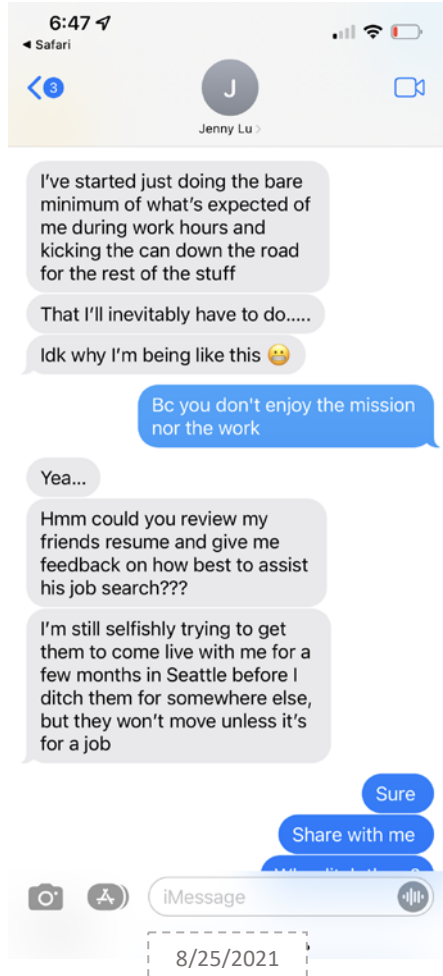


Exhibit 22

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

JENNY LU,
Petitioner,
v.
ANGELO PRADO,
RESPONDENT

DECLARATION OF LINA ZHU

1. I have personal knowledge of the facts herein, am over the age of 18, and am competent to testify. I hereby certify that the following is true and correct to the best of my ability under penalty of perjury.
2. I was the primary romantic partner of the Respondent, Angelo Prado. We were in a non-monogamous but committed partnership from November 2019 through early 2022. To my knowledge, Petitioner, Jenny Lu, had been a non-primary dating partner of Respondent from

HART JARVIS MURRAY CHANG PLLC
155 NE 100th Street Suite 210
Seattle, WA 98125
206-661-1811
206-260-2950 (fax)

1 some time in 2019 through approximately June 2022. During Respondent and my
2 relationship, I have interacted with Petitioner Jenny Lu on numerous occasions, in person and
3 via electronic communication.

- 4 3. Over the course of Respondent and Petitioner's relationship, I observed that they had many
5 disagreements, however I did not observe Respondent exhibiting abusive or violent behavior
6 at any time over the past 2 years.
- 7 4. I have, however, observed innumerable breakups, reconciliations and more conflicts resulting
8 in Petitioner's desire solely for financial support from Respondent, and Respondent's efforts
9 to assist Petitioner in advancing her career. Petitioner stated to me on numerous occasions
10 when we spoke alone, without the presence of Respondent, that she only wanted financial
11 support from him.
- 12 5. On or around Christmas 2020, Petitioner, Respondent and myself went on a Christmas
13 roadtrip together. Petitioner shared with me that she has a traumatic brain injury from a car
14 accident prior to meeting Respondent, which according to her resulted in her inability to
15 focus at work. Petitioner stated that she did not want to be in the workforce, and told me that
16 discussions of work were a trigger for her. Petitioner stated on numerous other occasions that
17 she wanted financial support from Respondent.
- 18 6. On or around September 2021, Petitioner met with me alone on the sun deck of my prior
19 residence, and shared that she no longer wished for a relationship with Respondent but felt
20 that she was entitled to financial support.
- 21 7. While I did not observe Respondent's behavior to be stalking or abusive, I have repeatedly
22 encouraged Respondent to either provide the desired financial support to Petitioner or end the
23 relationship so that Petitioner may focus her energies on finding a partner who is willing to
24 provide the increased financial support she desires. I have observed Respondent's repeated
25 attempts to provide Petitioner with career assistance, which I believe based on Petitioner's

1 statements to me was not desired by Petitioner.

2 8. With respect to Petitioner's allegations of sexual abuse, I can attest that I have never
3 observed Respondent engaging in any form of sexual abuse or coercion including but not
4 limited to his interactions with Petitioner. Petitioner has complained to me on numerous
5 occasions about Respondent's failure to provide her with sufficient means to finance her
6 lifestyle while we were alone and not in Respondent's presence. However, Petitioner has
7 never mentioned to me any indication of sexual misconduct.

8 9. I can be contacted if the court has any questions at (914) 393 1652 or
9 lina.zhu2288@gmail.com

10
11
12 Signed on July 14, 2022 in Seattle Washington

13
14 /s Lina Zhu

15 Lina Zhu
16
17
18
19
20
21
22
23
24
25
26

27 DECLARATION OF LINA ZHU--3

28 HART JARVIS MURRAY CHANG PLLC
155 NE 100th Street Suite 210
Seattle, WA 98125
206-661-1811
206-260-2950 (fax)

Exhibit 23

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

JENNY LU,
Petitioner,
v.
ANGELO PRADO,
RESPONDENT

DECLARATION OF ANGELO PRADO

1. I, Angelo Prado, have personal knowledge of the facts herein, am over the age of 18, and am competent to testify. I hereby certify that the following is true and correct to the best of my ability under penalty of perjury.
2. I currently live in Seattle, Washington, and have lived in the Puget Sound area for a total of 7 years. I have a degree in Computer Science and have worked at Microsoft in different roles for a total of six years, most recently as a Director of Engineering. I am also an assistant professor at Comillas University in Madrid, Spain. Prior to that, I lived in New

HART JARVIS MURRAY CHANG PLLC
155 NE 100th Street Suite 210
Seattle, WA 98125
206-661-1811
206-260-2950 (fax)

1 York where I met the petitioner, Ms. Jenny Lu. I have never been convicted of any crimes,
2 and I don't have any open civil or criminal matters outside of this petition against me.

- 3 3. Jenny Lu and I met in 2019 and had maintained a personal friendship long before our
4 professional relationship. She became a close friend of mine and my partner at the time,
5 Lina Zhu. We continued a friendly relationship with social outings, trips together and
6 occasional intimacy.
- 7 4. As a personal favor, I helped Jenny prepare for interviews, revamped her entire resume,
8 referred her to several IT industry contacts for coaching, reviewed many IT concepts with
9 her (as she does not have a background in technology) and ultimately helped her get hired at
10 Microsoft last year. Jenny and I agreed to keep our casual personal friendship separate from
11 work, since her main partner at the time lived in LA, and we both didn't want an exclusive
12 relationship regardless.
- 13 5. Today, Ms. Lu is a Technical Project Manager (TPM) on a team of 15 people that I lead –
14 For all intents and purposes, Jenny reports to Nitin Jami for day-to-day work **[Exhibit 1]**, as
15 I don't have the capacity to manage her work directly. I see the best in people, and I saw a
16 lot of potential in Jenny – we had an agreement that if I referred her, she would look for a
17 team elsewhere in the company within 6 months of joining.
- 18 6. Unfortunately, Ms. Lu has been struggling with performance issues according to her Team
19 Lead, Nitin Jami. Other leads including Tom, Patrick and Chaitra have expressed similar
20 concerns, and she recognized this herself **[Exhibit 2]**.
- 21
22
23
24
25
26

Feedback on Jenny Lu



Nitin Jami (IDENTITY SECURITY)
To: Angelo Montes (IDENTITY SECURITY)

😊 Reply Reply All Forward 📧 ⋮

Wed 4/20/2022 11:18 AM

Hey Angelo,

Just a few observations on Jenny Lu over the past couple of weeks. As a Project Manager, I'm afraid Jenny is unable to contribute directly to ease the operational work of this team as well as project management. My main concerns are:

- She is not skilled to do project management. Security may be new to her, but basic project management shouldn't be. She is unable to come up with doc templates, ADO work item follow ups and in general chasing after folks in getting status updates (wiki updates as an example).
- In a couple of meetings, I've asked her to take notes and come up with workstreams/owners as follow-ups. She couldn't do them, I've to end up spending extra hours in getting them down. So, anything that should ideally take 1 hour to finish becomes 2+ hours as I have to guide her on how to do project management.
- Lastly, Jenny makes a lot of mistakes with TM scheduling. The amount of clean up I have to do every week is getting out of hands at this point.

I'm sorry to say this but we misjudged her skill sets during interviews. I'll continue to share my observations on this topic.

Thanks,
Nitin Jami
Senior Security Architect
Identity Product Security
Office: +1 425-707-9286
nitin.jami@microsoft.com



7. I had to cover for unjustified absences, lack of delivery on metrics / business reviews, and unreported paid time off. Following performance feedback from her colleagues, she went on non-FMLA leave of absence roughly four months into her job – I was supportive of this.
8. Jenny and I have exchanged thousands of text messages and some correspondence at work. To my knowledge, not a single one contains threats or coercion. Her attitude towards me has been increasingly hostile when I asked to work on her performance at work by enrolling into formal TPM training. In 2021, she acquired a device to simulate 'fake mouse movements', to maintain online presence when not in front of the computer [Exhibit 3]. I Asked her to discontinue usage of this hardware, but she wouldn't.
9. It is true that I personally assisted her to secure this new job opportunity, with the understanding that she would eventually interview on a different team. I did not request any

DECLARATION OF ANGELO PRADO--3

HART JARVIS MURRAY CHANG PLLC
155 NE 100th Street Suite 210
Seattle, WA 98125
206-661-1811
206-260-2950 (fax)

1 compensation in exchange, and we agreed to keep our distance in the workplace. In
2 hindsight, it was a mistake to offer Jenny a position at Microsoft – this was contingent on
3 her working on technical project management (TPM) classes and acquiring the necessary
4 skills. I offered to pay for a formal program, but she was unwilling to put in the effort.

5 10. Ms. Lu’s actions are causing me significant emotional and professional distress and I am
6 taking extended time off from work as a result. I won’t be able to join any team meeting,
7 communicate with my team (we use email distribution groups, and the software 'Microsoft
8 Teams’), or come anywhere near Redmond or Bellevue with such a broad restraining order
9 (1,000ft from any Microsoft office, even though she works from home). I cannot attend the
10 gym that I have been a member of since 2007 (she requested both Pro Club Seattle and
11 Bellevue locations to be excluded). If this unjust petition is granted, I would have no option
12 but to resign from my job and possibly move out of state.

13 11. There has not been a single threat in real life, via phone, text, or any work platform.

14 12. Ms. Lu is financially motivated, has directly obtained tens of thousands of dollars from me,
15 and has repeatedly mentioned she would leverage the judicial system to “*get a payout from*
16 *Microsoft and have an exit plan*” after working at the company for a handful of months.
17 This was very disappointing to hear. In our last conversation, she mentioned she had
18 consulted an employment attorney and that she was building a case for a settlement. I
19 naively failed to anticipate this would happen.

20 13. I have never been sexually or emotionally abusive towards Ms. Lu. I have been nothing but
21 extremely supportive, despite her increasingly unreasonable demands for money, business
22 class flight bookings (at least 20 in the past year), technology, furniture, and other physical
23 gifts. Our intimacy has always been consensual, with healthy discussions around
24 boundaries, expectations, and protection. I invite any sort of evidence and timelines to the
25 contrary.

1 14. My primary partner at the time, Lina Zhu, was a friend of Ms. Lu and had direct knowledge
2 of our relationship. She can corroborate that in her interactions with Ms. Lu, she has never
3 observed or been told about any form of sexual coercion or abuse. She can also corroborate
4 that Ms. Lu has confided to her that she desired financial support from me. **[Exhibit 22]**

5 15. With regards to June 18th, Ms. Lu and I mutually agreed to meet at Starbucks after Ms. Lu
6 asked me to pick her up from the airport **[Exhibit 4]**, as well as her friend San. They were
7 flying in from New York (Ms. Lu asked me to book that flight) and I was in Seattle.

8 16. We both have broken off our personal relationship on several occasions and then gotten
9 back together. Starbucks was loud and we decided to walk to a nearby chocolate shop, Rey
10 Amargo. Unfortunately, after we sat down, she started elevating her voice which made me
11 feel uncomfortable – the shopkeeper can likely verify this. I took care of the check and then
12 she suggested we move to a casual restaurant next door. She was, in fact, not followed, as
13 we both walked together to Noren (Sushi restaurant), which she personally suggested.

14 17. I did not, nor have I ever harassed her or threatened to harass her through her friends. I have
15 never contacted her family and have not initiated any adverse legal action against her.
16 Beyond a difficult conversation, the reality is that I did not engage in any harassment or
17 threats, or harassment against her friends. She would often invite me to meet them and
18 socialize, or buy us drinks **[Exhibit 5]**

19 18. At Rey Amargo, Ms. Lu had initially indicated that she would cover the bill since I had paid
20 at the previous restaurant. But prior to the bill arriving, she was about to leave the
21 restaurant without paying, which made me uncomfortable. We ended up settling the check
22 after all. She said she had spoken to a lawyer and had a “*good case for a settlement*”, that I
23 was “*ill-positioned and wearing an ugly hat*”. At no point was she restricted from
24 movement inside the restaurant, and we did not physically touch each other.

25 19. On the street and in broad daylight, she started recording everything on her phone and called

1 her friend San. I started to feel unsafe about the whole situation and called my friend to ask
2 for advice, since we were having work-related disagreements at this point. She disengaged
3 from the conversation, and I ended the brief call as a result.

4 20. I continued to feel uneasy, since she started to raise her voice again and told me she gets the
5 right to do so, screaming things like “*life isn’t fair*” or “*I don’t have to be nice to you*”, “*I’ll*
6 *have you deported*”, and other expletives. I did not raise my voice towards Ms. Lu during
7 this encounter – had I done this in daylight witnesses would have intervened. She attempted
8 to enlist some more people on the street by telling them I was “*assaulting her*”. Bystanders
9 were in disbelief, and I decided to end our conversation and headed the other way taking
10 East Pine Street towards my home in 4th Avenue. Jenny went in the opposite direction via
11 Pike Street.

12 21. We walked in opposites directions (East vs. West) and then I turned to take a different street
13 and head back towards my apartment in 4th Avenue. Several blocks later, (approximately
14 after 10 minutes) Jenny Lu was standing near the corner of Pine and 9th Avenue with her
15 friend, San. My residence is on the way to Ms. Lu’s apartment so even though we took
16 different routes, it was not unusual that we saw each other while on my way home.

17 22. After seeing each other and making eye-contact, we mutually engaged in conversation again
18 (I can’t precisely remember who initiated it) and kept a healthy distance from each other. I
19 am confident San as well as other bystanders in front of the Carlile Room (restaurant in the
20 corner of Pine and 9th Ave) would corroborate that I did not make any threats. Ms. Lu also
21 recorded the conversation on her phone camera, which would further corroborate this.

22 23. While we both were emotional, disappointed, and stressed during this event, I told her that
23 we should not continue escalating things this way, that I still cared about her, and there was
24 a better way to end our relationship. Her friend was rather reasonable, and asked Jenny to
25 come inside her building. Jenny chose to continue the conversation with me out in the street,

1 which I engaged in out of mutual interest. We talked for roughly another 5-10 minutes.

2 24. This was all recorded with video on Jenny's phone, which made me self-conscious but
3 would show that there were no threats. Eventually, San persuaded Jenny to end the
4 conversation and we parted ways. I never went into her building uninvited. I was
5 disappointed at Ms. Lu's escalation and handling of the situation, and as a result we haven't
6 spoken since.

7 25. I have never threatened Ms. Lu, abused Ms. Lu, or forced her to do anything. I have not,
8 and would not do anything to intentionally damage her reputation professionally, socially or
9 with any of her romantic interests. We have exchanged tens of thousands of text messages
10 since late 2019. I can't find one that could be construed as threatening, violent, abusive or
11 consistent with Ms. Lu's allegations. I have tried to help Ms. Lu. I helped her find work at
12 Microsoft which approximately tripled her income. Despite this, she continued to demand
13 payments of \$3,000-\$5,000 per month from me **[Exhibit 7]**. Regarding the allegations of
14 financial control, the reality is that she would increasingly make demands for money which
15 stretched my own financial capacity and made me uncomfortable **[Exhibit 7 and Exhibit**
16 **22]**.

17 26. I did not force her to relocate to Washington or pressure her in any way. Ms. Lu was not
18 living in New York when she started her role at Microsoft. In reality, she was in Venice,
19 California for months, since September 2021, because New York was "too cold" and she
20 wanted to live on the beach. Last year, Ms. Lu decided to not renew her NYC studio lease in
21 September and moved to Venice Beach (city of Los Angeles) where her best friend lives.

22 27. When she moved to Venice, at her own volition, she asked if I would give her my Mazda 3
23 car. I terminated an active lease, covered roughly a \$10,000 loss including depreciation,
24 early termination, fees and sales tax, and sold it to Ms. Lu at a steep discount. **[Exhibit 8]**

25 28. Later, she requested a relocation to Seattle. The job was actually posted for the East Coast

26 DECLARATION OF ANGELO PRADO--7

HART JARVIS MURRAY CHANG PLLC
155 NE 100th Street Suite 210
Seattle, WA 98125
206-661-1811
206-260-2950 (fax)

1 and it was available to be 100% remote from New York, where she had an apartment and
2 access to her parents' house. She wanted to come to Seattle since according to her "she had
3 several friends here" (not just me), "networking benefits, higher pay opportunity, and no
4 income tax". She accepted a full relocation package from Microsoft (worth over \$20,000),
5 stock, and a sizeable sign-on bonus worth even more. I have never prevented Ms. Lu from
6 seeing her family or friends, quite the opposite – I have booked Jenny more than 20 flights
7 to New York, many of which I would not fly with her.

8 29. At work, Ms. Lu and I are on the same team (with the expectation that she would transfer)
9 and was directly supervised by Nitin as her day-to-day Tech Lead. She has frequently
10 complained about "*doing poorly*" and "*dying from illness*", "*needing a lot of help*" that other
11 colleagues were "*talking down to her*", that she didn't know how to use internal tools and
12 that her "*brain was tired*" **[Exhibit 1]**.

13 30. Ms. Lu would often send me text messages documenting her struggles which put me in a
14 difficult position, and request assistance for which I was always accomodating. This is
15 clearly seen on **[Exhibit 1 and Exhibit 6]**: "*Nitin is riding me so hard*" ... "*Nitin is MAD at*
16 *me*" ... "*Tell Nitin I'm slowly dying from a glandular disease*" ... "*keep telling him I'm dying*
17 *from illness and at half productivity...???*" ... "*Nitin calling me outttt*". Nitin recently had a
18 daughter, and he is one of the most diligent and patient employees I know.

19 31. I never forced or pressured Ms. Lu to work with me at Microsoft, and she was free to
20 transfer to any other team from day one. She asked me to improve her career prospects and
21 I wanted to be useful. I assisted her with her resume, helped prepare for interviews, made
22 countless introductions, and helped her get hired **[Exhibit 9]**. Once at the company, I tried
23 to steer her in the right direction so she would be successful. When she struggled, I tried to
24 suggest how she could improve, and we brainstormed together.

25 32. Ms. Lu sent the following text which summarizes her gratitude at the time "*Really. Thanks*

1 *for prepping me” (...) “I’ll give it my best shot and see if I can suggest more curiosity and*
2 *capacity for learning technical knowledge”*

3 33. Ms. Lu was not unemployed when she was hired at Microsoft **[Exhibit 10]**. She was
4 employed as an Operations Manager at Exiger, a risk management and compliance firm.
5 She did ask me to help her with her career and I simply did what I could. Ms. Lu eagerly
6 accepted the opportunity with Microsoft. I have not threatened to fire Ms. Lu. Her
7 employment was never conditional on her being in any kind of social relationship with me.

8 34. In terms of our trips together, most of them preceded her job at Microsoft. She was never
9 forced to join me on any trips. Together we visited Mexico, Spain, Italy, Dubai, etc. She
10 would enthusiastically agree, and I would always cover our accommodation, all flights, and
11 expenses. She was excited to travel the world with me and there is plenty of evidence to
12 support this. **[Exhibit 11]**.

13 35. I also booked her many flights to New York and Los Angeles to see family and friends.
14 Sometimes I would accompany her for a few days, and other times I would simply purchase
15 her a ticket when she requested. I was always supportive of her visiting friends and family.
16 I have paid for every single flight ticket home at her request (can provide receipts upon
17 request), and when I would travel with her, we would typically share a hotel for 2-3 days
18 and then she would stay for the remainder of the week with another friend or with her
19 parents. I cannot stress enough that I never forced her or pressured her on any of these trips.

20 36. I have never held Ms. Lu against her will, have not alluded to any suffering she might
21 endure without my support or ever battered her over her supposed lack of worthiness. In
22 fact, there are plenty of messages where she says she’s not worth it and I suggest otherwise
23 to raise her self-esteem.

24 37. Ms. Lu has her own apartment and had the keys to my apartment – I never had her keys. She
25 was free to come and go as she pleased, taking things from it.

1 38. In all of our communications I have always noted I appreciated her, treated her with respect,
2 and not once questioned her worthiness.

3 39. Any physical intimacy between the two of us was entirely consensual. I have never sexually
4 coerced Ms. Lu and have only engaged in intimacy with her when we spent the night
5 together and it was clear that she was interested. Between us, this has always been safe,
6 sane, and most importantly consensual. I have not pressured her at any time to do anything
7 sexual that she did not want to participate in.

8 40. In terms of Ms. Lu's leave of absence from work, that had nothing to do with getting away
9 from me as far as I know. After her leave was approved, she was still in regular
10 communication with me. Ms. Lu had previously requested to work from home/remote 80-
11 100% of the time. I believe her initial motivation for a leave of absence was so she could
12 have some time to study, improve her skills, and have more time for fitness. I was
13 supportive of her in this regard.

14 41. After her leave started, she regularly communicated with me, spent time with me, and
15 traveled with me in April, May and June [Exhibit 12] and [Exhibit 13]

16 42. In April of 2022 Ms. Lu, while she was attending a pool party in Las Vegas for several days,
17 sent me a text message stating: "*Shrink wouldn't write me a LOA note :((...) Insurance*
18 *fraud*" (...) "*looks like my plan or at least timeline is kinda foiled :("* [Exhibit 14] and then
19 expressed joy when a new therapist agreed to write her a note.

20 43. With regards to Ms. Lu's claims that: "*Angelo responded by messaging me repeatedly on*
21 *numerous platforms*" – "*As well as messaging my friends (i.e. on LinkedIn - he found the*
22 *contact information of multiple friends and a former dating partner and threatened to*
23 *message them exposing me).* While estranged, he used work resources to ask coworkers to
24 message me to 'check in on me'"

25 44. This is not a fair nor accurate representation of what happened. While flying back from a
26

Dublin, Ireland work trip, Ms. Lu called me in the middle of the night via WhatsApp, at 4:26am Eastern Time on a Sunday [Exhibit 15].

45. I was asleep on the plane and was unable to answer her call – phone records and screenshots show this. Since I was traveling, and we would rarely call except for emergencies, I was genuinely concerned that she might have gotten into an accident or some safety related matter. During a brief connection in JFK, I thought it was my responsibility to do a welfare check.

46. I asked a coworker to check on Ms. Lu [Exhibit 15] as well as a common friend at the time, Maddie. This was the first and only time I asked someone else to reach out to Ms. Lu, as I feared seeing a call at 4am in the morning and did not know what else to do. Later that week we resumed talking as usual [Exhibit 12].

47. Regarding Ms. Lu's claim that *"He showed up to my apartment unannounced on 4/25 and was asked to leave and added to the restricted list"*, this is also inaccurate. I brought her some things and gave them outside as she was coming home. Jenny invited me over to her apartment for dinner in May and I picked her up to go to the gym several times after 4/25, in May and June [Exhibit 12, Exhibit 13].

48. It is unclear why she unilaterally added me to the restricted list, and I can guarantee this has never been enforced as I have never been inside her apartment building without her explicit consent. Since her building has security personal and the elevator requires a key fob, they should be able to document any unauthorized access attempts.

49. With regard to Ms. Lu's claim that *"He traveled across the country and again showed up uninvited at an event on my birthday in New York on 5/4 where he accosted me and my friend in public until he was asked to leave."* This is absolutely false. I did not approach Ms. Lu aggressively in any manner on 5/4. Her friend San should be able to corroborate this under oath, as well as any bystanders.

1 50. We both traveled to New York roughly every month, and actually had agreed to meet there
2 for her birthday. Ms. Lu agreed to have a drink and later canceled last minute [Exhibit 16]. I
3 came to the restaurant to give her a gift, she was outside, we had a conversation for about 10
4 minutes and then decided we would continue it at another time, at which point I left.

5 51. I must admit I was disappointed about how she decided to uninvite me from her birthday
6 last minute, but this all happened on the street outside of a major restaurant, and her friends
7 can corroborate that there were no threats of any kind. We resumed contact shortly after her
8 5/4 birthday, as evidenced on [Exhibit 12].

9 52. With regard to Ms. Lu's claim that "*He later revealed he had turned location sharing*
10 *services sharing on in my phone*" It is not true that I was unlawfully tracking Jenny's phone
11 as implied, as I don't possess access to any special spy software. By "*location sharing*
12 *services*", she is referring to Apple's "Find My Friends" application.

13 53. We decided to mutually share our location with each other for months, to build trust and
14 transparency [Exhibit 20]. The main reason we did this was in order to avoid messaging
15 when we were with other people at night or in social situations, as it was a constant issue in
16 our friendship. She voluntarily agreed to share location with me, and this was never used
17 maliciously. When she revoked her location, I similarly stopped sharing mine.

18 54. With regard to Ms. Lu's claim: "*on 5/16 he showed up at my gym (Pro Club Bellevue) and*
19 *demanding to speak, threatening self-harm and reputational harm if I did not comply.*
20 *During these episodes he repeatedly threatens further stalking and economic harm*" I have
21 been going to this gym long before Ms. Lu and I met. We have exercised at Pro Club
22 together countless times before and after [Exhibit 17, Exhibit 13, Exhibit 12]. On this day,
23 we ran into each other at Pro Club Bellevue and decided to have a two-hour long
24 conversation at the café to work through our differences. For the record, I have never been
25 suicidal and made no self-harm threats. This is baseless and untrue, despite her own

unfortunate jokes about "*attempting suicide*" [Exhibit 18].

55. Ms. Lu claims I threatened further economic harm – Even after her income at Microsoft tripled from her previous job, she was having cashflow issues and requested more money. She said she would need an additional \$3,000 every month to keep seeing me, which I objected to. Despite being employed and earning well over six figures, including stock and bonuses, Jenny requested \$5,000 for "*urgent cashflow problems*".

56. I conceded and provided \$1,000 in cash, which is all I could gather from the ATM, wrote her a check for \$2,000 and sent her \$2,000 via Venmo [Exhibit 7]. Her increasing financial demands on me and lack of empathy were a constant source of stress for me.

57. With regard to Ms. Lu's claim that "*I have been seeking treatment for depression since May 2021 due to psychological and emotional harm from the relationship. Since April 2022, I have been seeking treatment for PTSD, major depression, anxiety, insomnia and panic due to the effects of the stalking and verbal threats.*" There has been no stalking or violent threats of any sort towards Ms. Lu. She fails to disclose that many of these mental health issues precede our relationship, as Jenny would often share how she "*was involved in an accident that caused her brain damage*" [Exhibit 22] and has been diagnosed with a serious bipolar disorder. It is my understanding that she has been under medical care for many years and has asked me to pick up her own prescriptions from CVS on occasion [Exhibit 19].

58. I have been nothing but supportive of her struggle with mental health, and as a matter of fact, I myself have been seeing a therapist for years to cope with my own life challenges and disappointments, so I genuinely sympathize with this. We frequently discussed therapy as a healthy thing to do.

59. Ms. Lu's allegations are deceitful, and I cannot stress enough that I would never hurt her, threaten to hurt her, or force her to do anything that she did not want to do. I am sad and disappointed that she has utilized the court this way. Regardless of the outcome, I am not

1 planning on continuing my relationship with Ms. Lu going forward. I have personally
2 helped several domestic violence victims, donated, and volunteered with SF-Marin Food
3 Bank and Safe Horizons, a non-profit organization for victims of abuse and violent crime.
4 60. Wrongfully claiming to be a victim of sexual assault and domestic violence is a very serious
5 thing to do. I have never engaged in any form of violence towards Ms. Lu, have been
6 supportive of her to the best of my ability and am saddened by the allegations.

7
8 Signed on July 15, 2022, in Seattle Washington

9 /s Angelo Prado

10 Angelo Prado
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26